

HON. SYLVIA O. HINDS-RADIX Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

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May 31, 2023

## **VIA ECF**

Honorable Lewis A. Kaplan United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Britvec, et al. v. City of New York, et al., 21 Civ. 10759 (LAK)

Casablanca-Torres v. City of New York, et al., 21 Civ. 10832 (LAK)

## Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York ("City") and the attorney assigned to the defense of the above-referenced matters. Defendants write to request a two-day extension of time until June 2, 2023 to respond to plaintiffs' request for tolling. (See Britvec ECF No. 26 and Casablanca-Torres ECF No. 74). This is defendants' first request for an extension of time and plaintiffs consent to this request.

Defendants require a brief extension of time in order to sufficiently respond to plaintiffs' motion. It should be noted that plaintiffs' motion was filed on the Friday evening preceding Memorial Day weekend and this office was closed on Monday in observance of the holiday. Due to conflicting professional obligations yesterday and today, defendants require additional time to finalize their response.

Accordingly, defendants respectfully request an extension of time until June 2, 2023 to respond to plaintiffs' motion. Thank you for your consideration herein.

Respectfully submitted,

/s/ Andrea Osgood

Andrea Osgood

Senior Counsel

Special Federal Litigation Division

cc: All Counsel of Record (via ECF)